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July 30, 2020

VIA ECF

Honorable Lois Bloom, Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza  
Chambers 1212  
Brooklyn, NY 11201

Re: Medvedeva v. Assistcare Home Health Services LLC d/b/a Preferred Home  
Care of New York  
17-CV-05739 (LB)

Dear Magistrate Judge Bloom:

We are pleased to inform the Court that after extensive discussion and deliberation, and notwithstanding the unequivocal prior agreement, Defendant has agreed to carve out the wage parity claim in the manner that we understand the proposed intervenors wish to preserve. We have circulated revised release language to counsel for Plaintiff and the proposed intervenors. While Plaintiff's counsel has expressed approval of this language, they have nonetheless stated an intention to withdraw the motion for preliminary approval, thus jeopardizing what Defendant believes is a complete resolution of the issue that threatened the settlement. We thus respectfully request the Court to order Plaintiff's counsel not to file any withdrawal papers and to briefly stay these proceedings until following a status conference at the Court's earliest convenience regarding these ongoing developments.

Very truly yours,

/s/

W. Matthew Groh

cc: All counsel of record (via ECF)